

April 16, 2012

Judy Huang  
Remedial Project Manager  
US Environmental Protection Agency  
75 Hawthorne Street, Mail Code SFD-8-3  
San Francisco, CA 94105

**Re: In the Matter of Kaanapali Land, LLC, Respondent, Proceeding Under Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9606(a); U.S. E.P.A. Docket No. 9-2009-14: Unilateral Administrative Order Dated September 30, 2009**

Dear Ms. Huang:

Thank you for your March 2, 2012 letter regarding the *Response to USEPA and Navy Comments on the Preliminary Data Gap Sampling Results and Proposed Additional Sampling Memo, Former Pesticide Mixing Site, Waipio Peninsula, Oahu, Hawaii* submitted by ENVIRON to USEPA on January 20, 2012.

The January 20<sup>th</sup> response was submitted following receipt of your November 18, 2011 letter regarding the *Preliminary Data Gap Sampling Results and Proposed Additional Sampling Memo, Former Pesticide Mixing Site, Waipio Peninsula, Oahu, Hawaii* ("Additional Sampling Memo"), which was submitted by ENVIRON to USEPA on November 9, 2011.

I have enclosed responses to comments for your review, and a related figure.

If you have any questions, please feel free to contact me at your convenience.

Sincerely,



Stephen T. Washburn  
Principal  
Designated Project Coordinator

Enclosures

cc: Janice Fukumoto, Division Head  
Cowan Azuma, Remedial Project Manager  
U.S. Dept. of the Navy, Environmental Restoration Division  
  
Fenix Grange, Supervisor  
Site Discovery Assessment and Remediation  
Office of Hazard Evaluation & Emergency Response  
Hawaii State Department of Health

**RESPONSE TO MARCH 2, 2012 USEPA AND NAVY COMMENTS**

**FORMER PESTICIDE MIXING SITE,  
WAIPIO PENINSULA, WAIPAHU, HAWAII**

**April 16, 2012**

## **USEPA COMMENTS**

### **1. EPA Review of Response to General Comment (GC) 1**

*The response partially addresses the concerns raised in the original comment; there remains an area between DG-25 and DG-37 (a distance of 125 feet) where the extent of contamination is not delineated.*

*Additionally delineation of contamination in the western portion of the site is not addressed. Specifically, sampling between DG-27 and DG-26 should be considered, as there is a distance of 210 feet where there are no samples. Please consider adding additional data points between DG 25 and DG-37, southwest of S06, and between DG-27 and DG-26 to complete contamination delineation.*

#### **Response**

In response to EPA's comment, and in addition to the sampling program outlined in the November 9, 2011 Proposed Additional Sampling Memo (Additional Sampling Memo) and the January 20, 2012 responses to EPA's November 18, 2011 comments, a delineation sample (DG-58) will be collected between existing locations DG-26 and DG-27, roughly 20 feet north of DG-26. In addition, another additional delineation sample (DG-59) will be collected southwest of existing location S06, roughly midway between existing locations DG-25 and DG-37. Both additional delineation samples would be analyzed for dioxin. This sampling would be performed as soon as feasible, prior to initiating the Engineering Evaluation/Cost Analysis (EE/CA) process (see response below). See attached figure for approximate locations of the proposed delineation samples.

### **2. EPA Review of Responses to GC2 and GC3**

*While it is understood that further delineation could be performed under the Engineering Evaluation/Cost Analysis (EE/CA) process, an accurate estimation of the volume of contaminants would still be required to evaluate capping alternatives, alternatives with deed restriction, or other remedies where contaminants might be left in place. Further, in evaluating alternative remedies for the EE/CA an accurate estimation of the vertical extent of contamination would be necessary in any Cost Analysis. There must be sufficient information gathered to accurately estimate the amount of impacted soil for a protective Cost Analysis. Please revise the memo to address these concerns.*

#### **Response**

As discussed above, two additional samples (between existing locations DG-26 and DG-27, and southwest of existing location S06, roughly midway between existing locations DG-25 and DG-37) will be collected and analyzed for dioxin to complete lateral delineation prior to initiating the EE/CA. As explained in the January 20, 2012 responses to EPA's November 18, 2011 comments, vertical delineation of vadose zone soils to the criteria identified in the EPA-approved May 2011 Data Gap Study Work Plan (DGSWP) and in EPA's 2009 Unilateral Administrative Order (UAO), including the unrestricted land use value of 450 nanograms per kilogram (ng/kg) for dioxin, is already complete.<sup>1</sup> Thus, after completion of lateral delineation activities as described above

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<sup>1</sup> Residential, commercial or industrial use of the site, which lies within the Navy's Explosives Quantity Distance Arc (also known as the Blast Zone), is precluded for the foreseeable future. According to the July 1995 *Hawaii Military Land Use Master Plan*, Waipio Peninsula lands will be required in the long range to maintain the explosive safety zones". The comparison to the unrestricted land use benchmarks has been requested by EPA to address a theoretical, highly unanticipated future residential land use scenario, so that the bounds of potential institutional controls can be defined for consideration in the EE/CA.